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16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 IN RE SEAGATE TECHNOLOGY LLC  
20 LITIGATION

No. 3:16-cv-00523-JCS

21 CONSOLIDATED ACTION  
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**DECLARATION OF ASHLEY A. BEDE  
IN SUPPORT OF STIPULATION AND  
[PROPOSED] ORDER FOR EXTENSION  
OF TIME TO FILE OPPOSITION TO  
AND REPLY IN SUPPORT OF MOTION  
TO STRIKE AND FOR JUDGMENT ON  
THE PLEADINGS**

1. I am an attorney at Hagens Berman Sobol Shapiro LLP and am one of the attorneys admitted *pro hac vice* in the above-captioned case. I am licensed to practice law in the State of Washington.

2. The parties have stipulated to a request for an extension of time for filing of Plaintiffs' opposition to Defendant's Motion to Strike and for Judgment on the Pleadings (ECF No. 114) and Defendant's reply to the same.

3. Plaintiffs requested an extension of time to respond to Defendant's Motion to Strike and for Judgment on the Pleadings because, per Defendant's request, many named plaintiffs' depositions are occurring in the first two weeks of June. The parties have scheduled five named plaintiffs' depositions from June 2 through June 15.

4. To prevent prejudice to the parties or the Court's time in reviewing the relevant papers, the parties have agreed that Plaintiffs' opposition brief will be due June 23, 2017, and Defendant's reply on July 12, 2017. The parties accordingly request that the hearing on Defendant's motion be continued to July 28, 2017.

5. The requested time modification would have no effect on any other deadlines in the case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 6th day of June, 2017, at Seattle, Washington.

/s/ Ashley A. Bede  
ASHLEY A. BEDE